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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

No. 3:22-cr-00210-HZ

v.

INDICTMENT

SOLOMON COOK,

18 U.S.C. §§ 2251(a) and (e) and 2

18 U.S.C. § 2252A(a)(2)

Defendant.

18 U.S.C. § 2252A(a)(5)(B)

Forfeiture Allegation

THE GRAND JURY CHARGES

**Count 1
(Sexual Exploitation of Children)
(18 U.S.C. §§ 2251(a) and 2)**

On or about January 1, 2022, in the District of Oregon, defendant **SOLOMON COOK** knowingly employed, used, persuaded, induced, enticed, and coerced Minor Victim 1, a person under the age of 18, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct or transmitting a live visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, and such visual depiction having actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2.

Count 2
(Attempted Sexual Exploitation of Children)
(18 U.S.C. § 2251(a) and (e))

Beginning on or about January 14, 2022, and continuing through on or about January 19, 2022, in the District of Oregon, defendant SOLOMON COOK knowingly attempted to employ, use, persuade, induce, entice, and coerce a person who he believed to be a minor under the age of 18, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct or transmitting a live visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.

In violation of Title 18, United States Code, Section 2251(a) and (e).

Count 3
(Receiving Child Pornography)
(18 U.S.C. § 2252A(a)(2))

On or about January 1, 2022, in the District of Oregon, defendant SOLOMON COOK knowingly received child pornography using any means or facility of interstate or foreign commerce, or that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2).

Count 4
(Possession of Child Pornography)
(18 U.S.C. § 2252A(a)(5)(B))

On or about May 11, 2022, in the District of Oregon, defendant SOLOMON COOK knowingly and unlawfully possessed material containing child pornography that had been shipped or transported using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce by any means, including by computer, or that was

produced using materials that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

Forfeiture Allegation

Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense described above in Counts 1-4 of this indictment, defendant **SOLOMON COOK** shall forfeit to the United States any and all matter that contains visual depictions of minors engaging in sexually explicit conduct, any and all property that was used or was intended to be used in any manner or part to commit or promote the commission of the violations alleged in those counts, or any property, real or personal, constituting or traceable to proceeds of those offenses.

DATED: June 7, 2022.

A TRUE BILL

OFFICIATING FOREPERSON

Presented by:

SCOTT ERIK ASPHAUG
United States Attorney


MIRA CHERNICK
Assistant United States Attorney